

IN THE UNITED STATES DISTRICT COURT MIDDLE DISTRICT OF TENNESSEE,  
NASHVILLE DIVISION

JOHN RUFFINO and MARTHA RUFFINO, )  
Husband and Wife, )

Plaintiffs, )

v. )

DR. CLARK ARCHER and HCA HEALTH )  
SERVICES OF TENNESSEE D/B/A )  
STONECREST MEDICAL CENTER, )

Defendants. )

Civil Action No.: \_\_\_\_\_

---

AFFIDAVIT OF BRIAN MANOOKIAN  
DEMONSTRATING PLAINTIFF'S COMPLIANCE  
WITH TENN. CODE ANN. § 29-26-121(a)(3)(B)

---

STATE OF TENNESSEE )  
COUNTY OF DAVIDSON )

After first being duly sworn, the affiant, Brian Manookian, states as follows:

1. My name is Brian Manookian. I am an adult citizen, over the age of eighteen years, and am competent to make the statements contained in this Affidavit.

2. On December 30, 2016, I mailed written notice of a potential health care liability action (attached as **Exhibit 1A**), including a list of the names and addresses of all other providers who were being sent a notice, as well as HIPAA-compliant medical authorizations permitting all listed providers to obtain complete medical records from one

**EXHIBIT**

**1**



another, by certified mail, return receipt requested, after obtaining a Certificate of Mailing (attached as **Exhibit 1B**), from the U.S. Postal Service to:

<p>Dr. Clark Archer TriStar StoneCrest 200 StoneCrest Boulevard Smyrna, TN 37167</p> <p>Dr. Clark Archer 2910 South Church Street Suite B Murfreesboro, TN 37127</p>	<p>StoneCrest Medical Center 200 StoneCrest Boulevard Smyrna, TN 37167</p> <p>StoneCrest Medical Center Registered Agent CT Corporation System 800 South Gay Street, Suite 2021 Knoxville, TN 37929</p>
<p>Dr. Deka Efobi 305 West Main Street Lebanon, TN 37087-3545</p>	<p>Neurology Clinic &amp; Associates 305 West Main Street Lebanon, TN 37087-3545</p> <p>Neurology Clinic &amp; Associates P.O. Box 414 Brentwood, TN 37024-0414</p>

Further Affiant sayeth not.

  
BRIAN MANOOKIAN

Sworn to and subscribed before me this  
20<sup>th</sup> day of April, 2017.

  
NOTARY PUBLIC

My Commission Expires:

08/20/2019

